

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2006-____-C

In re:)	EMERGENCY PETITION
Emergency Petition of)	FOR EXPEDITED
The Office of Regulatory Staff)	RELIEF AND
To Require BellSouth to Provide Notice to)	REQUEST FOR
ConnectNow Customers)	APPOINTMENT OF
)	HEARING OFFICER
)	

OFFICE OF REGULATORY STAFF'S
EMERGENCY PETITION FOR EXPEDITED RELIEF

The Office of Regulatory Staff ("ORS") hereby petitions the Public Service Commission of South Carolina (the "Commission") for an order requiring BellSouth Telecommunications, Inc. ("BellSouth") to provide automated telephonic notice to ConnectNow customers. Pursuant to the Commission's Order No. 2006-76 in Docket No. 2005-100-C, ORS respectfully requests that the Commission act on this Petition as quickly as possible. In support of this Petition, the ORS respectfully provides the following:

1. Pursuant to the Commission's Order No. 2006-76 in Docket No. 2005-100-C, BellSouth provided ORS a copy of a termination notice sent to ConnectNow on September 21, 2006.

2. ORS contacted Mr. Carter, president of ConnectNow, and requested that Mr. Carter agree to allow BellSouth to remove the local preferred carrier freeze. Mr. Carter has requested and BellSouth has agreed to lift the preferred carrier freeze associated with ConnectNow accounts. Further, Mr. Carter has also agreed to allow

BellSouth to provide automated telephonic notification to ConnectNow customers of the impending termination of service, if it is technically feasible to do so. Upon information and belief, ConnectNow is not able to provide customer notice prior to the proposed termination date.

3. Upon information and belief, ConnectNow has more than 10,000 subscribers in BellSouth territory in South Carolina.

4. Even if ORS were to request of and receive from BellSouth the necessary information (i.e. name, telephone number, address) to contact each ConnectNow end user, ORS would not have sufficient time to notify each ConnectNow end user of the impending termination of service.

5. Pursuant to Commission Order No. 2006-76, ORS requests that the Commission “use all appropriate measures, including without limitation the use of hearing officers, to consider, and if appropriate, rule on such matters on an emergency and expedited basis.”¹

6. ORS further requests that the Commission order BellSouth, to the extent technically feasible, to use good-faith efforts to provide automated telephonic notice to the ConnectNow end users of the impending termination of service, and to delay any termination of service for at least one business day after removal of the preferred carrier freeze and execution of these good-faith efforts to provide such automated telephonic notice. The purpose of this request is to allow, to the fullest extent practicable, end users to move their services to another carrier of their choosing and to keep their telephone numbers in doing so. Attached as Exhibit A to this Petition is the proposed script

¹ *In re: Generic Proceeding to Investigate Emergency Services Continuity Plans*, Docket No. 2005-100-C, Order No. 2006-76 at page 3, S.C. PSC (February 27, 2006).

notifying ConnectNow customers of the pending disconnection of service, and ORS respectfully requests that the Commission order BellSouth to use this script in providing the automated telephonic notification requested in this Petition.

7. ORS has consulted with BellSouth and, in this particular instance, BellSouth does not object to the relief requested in this Petition or to ORS's request for an expeditious ruling on this Petition. BellSouth, however, has informed ORS that absent payment of all past-due amounts on or before Friday, October 6, 2006, BellSouth intends to disconnect ConnectNow's service even if this Petition is still pending.

WHEREFORE, for the reasons set forth above, ORS respectfully requests this Commission to issue an order requiring BellSouth to (1) use good-faith efforts to provide telephonic notice to the ConnectNow end users of the impending termination of service; and (2) use the script attached as Exhibit A in providing the automated telephonic notification requested in this Petition; and (3) delay any termination of service for at least one business day after removal of the preferred carrier freeze and execution of good-faith efforts to provide such automated telephonic notice. Additionally, given the nature of this Petition, ORS respectfully requests that the Commission appoint a hearing officer to facilitate an expeditious ruling on the issues raised by this Petition.

Respectfully submitted,

/s/ Nanette S. Edwards

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EXHIBIT A

This is an important message to ConnectNow customers. If you have placed an order to transfer your telephone service to another provider, you may hang up now. (Short pause).

Attention ConnectNow customers. Telephone service provided by ConnectNow is scheduled to be interrupted on October 7, 2006. You must contact a new service provider as soon as possible to avoid disruption of your telephone service. You have the option of choosing any other local service provider in your area. Many telephone directories contain a list of local service providers. If you fail to select another service provider, your telephone service may be interrupted, and if you establish new service after interruption, you may not be able to keep your same telephone number. Please take action immediately.